



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

ATLANTA, GEORGIA

JUN 15 1992

REF: 4WD-SSRB

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James C. Brown, Manager
Environmental Technology
Olin Chemicals
Post Office Box 245
Lower River Road
Charleston, Tennessee 37310

YELLOW

RE: Olin Corp./McIntosh Plant Superfund Site
Revised Remedial Action Objectives Technical Memorandum

Dear Mr. Brown:

Please find enclosed comments on the Revised Remedial Action Objectives Technical Memorandum. Please provide a line-by-line response to each comment no later than **close of business on July 8, 1992**.

I will review your response and determine if EPA's concerns have been fully addressed. After my review, I will advise you to either incorporate your comments in future deliverables or request further clarification of your position. This is the approval process that I will utilize for future technical memoranda that require EPA's approval.

Consequently, if any of the enclosed comments are unclear, please give me a call at (404)347-2643 on or before June 26, 1992.

Sincerely,

Cheryl W. Smith
Remedial Project Manager
South Superfund Remedial Branch

Enclosure

cc: Joe Downey, ADEM
Toni Odom, Olin

**Technical Review Comments on the
REVISED REMEDIAL ACTIONS OBJECTIVES
TECHNICAL MEMORANDUM
Olin Corp. Superfund Site
McIntosh, Alabama**

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GENERAL COMMENTS:

The document included adequate indication that you are on target with development of remedial action objectives that are protective of human health and the environment. Specifically, enough general information was presented as specified in applicable EPA guidance (Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, Section 4.2.11, OSWER Directive 9355.3-01, October 1988). However, future sampling efforts will require reconsideration of the following:

- The contaminants of concern
- Exposure routes and receptors
- An acceptable contaminant level or range of levels for each exposure route (i.e. preliminary remediation goals)

SPECIFIC COMMENTS:

1. Page 8, Paragraph 4. Since EPA has recommended additional soil sampling that may produce air/dust emissions, additional sampling of air emissions may be required and included as a potentially affected media
2. Page 9, Paragraph 1. All contaminants present on site must be addressed regardless of their origin (i.e., pesticides in basin)
3. Page 10, Paragraph 1. Remove the following sentence from future submittals: "Alpha BHC is not considered an Olin constituent." Pesticides detected on site should not be excluded as contaminants of concern because the source is from a source other-than-Olin. The baseline risk assessment is to determine the total environmental risks to a person at the site and therefore should include all contaminants regardless of the source.